

## **REMARKS**

Applicant has now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of November 12, 2003. All of the objections and/or rejections are traversed. Reexamination and reconsideration are respectfully requested.

### **Regarding the Drawings**

Applicant notes that the Office Action Summary lists the Drawings filed on "27 April 2000" as objected to by the Examiner. However, Replacement Drawing Sheets were submitted along with the previously filed Amendment A on September 2, 2003.

### **Summary of the Office Action**

Claim 7 has been allowed, as per the body of the Office Action. However, the Office Action Summary again appears to be in error (listing the claim as objected to).

Claims 1-6 and 8-18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Chase, et al. (U.S. Patent No. 6,456,397, hereinafter Chase) in view of Yoshida, et al. (U.S. Patent No. 5,719,680, hereinafter Yoshida).

### **Comments/Arguments**

Applicant appreciates and thanks the Examiner for recognizing the allowability of claim 7, and indicating the same. As there are no outstanding objections and/or rejections related to this claim, no further comment thereon is deemed necessary. However, the rejection of claims 1-6 and 8-18 is hereby traversed.

Significantly, as before, the Examiner continues to misread and/or misinterpret the teachings of Chase. For example, nowhere does Chase teach "obtaining a characterization at selected locations across the array lens" or "from the characterization, determining compensation parameters for a plurality of locations across the array lens." Notably, Chase does not teach any method or device by which any actual characteristic of the printing devices (i.e., the lasers) or the lens assemblies are measured or obtained. In fact, to Chase, the actual characteristics of the lasers or lens assemblies is irrelevant inasmuch as Chase is not trying to correct the actual errors or artifacts attributable thereto. Rather, Chase attempts to blend them out so as to make them less noticeable.

The Office Action simply fails to adequately point out where Chase allegedly teaches the claimed steps or elements. Rather, it merely cites irrelevant passages of text that bear no rational relationship to what is being claimed. For example, as allegedly teaching the step of "obtaining a characterization at selected location across the array lens," the Office Action cites to "FIG. 3, column 6, line 57 through column 7, line 9, laser sources L1, L2, L3, L4, driven by suitable laser drivers collectively designated by reference numeral, and lines 54-63, recognizes the different relative positions of the lens assemblies with respect to substrate 55." Applicant cannot see how this is suppose to teach the claimed step. It simply does not. It is largely irrelevant to what is being claimed. Rather, it merely details the configuration and operation of the lasers L1 ... L4, writing head 150 and substrate 55. Nowhere is there any teaching or suggestion of anything that can be fairly equated with "obtaining a characterization at selected locations across the lens array." Nowhere is any characterization of the lens assemblies 96 obtained or measured. The fact that the controller 80 may recognize the location of the lens assemblies 96 with respect to the substrate 55 in no way equates with obtaining a characterization of the lens assemblies 96. Simply knowing the position of the lens assemblies 96 relative to the substrate 55 does not reveal anything about artifacts that they may introduce.

Further, Chase teaches nothing about "determining compensation parameters" from the characterization(s). Chase does not correct the imaging based on a characterization of the lens assemblies 96. In fact, Chase does not teach correcting for artifacts. Rather, Chase teaches that any introduced artifacts can be obscured or hidden by blending the zones imaged by each device by operating adjacent devices such that the zones the devices would ordinarily cover or render are blended in a random pattern. See, e.g., the Abstract. This is not the same as determining compensation parameters from characterizations obtained across the lens array. Chase determines no correction factors from any obtained characterizations of the lens assemblies 96.

Additionally, Yoshida fails to make up for the shortcoming of Chase. Yoshida discloses nothing about any array lens, characterization thereof or compensation factors derived from the characterization. Nevertheless, the Office Action cites to column 2, lines 15-22, stating that Yoshida "teaches according to the setting of the deskewing unit, thereby compensation for head skew and supplies the selected data

to the printing head.” While Applicant is frankly uncertain what is meant by this statement, clearly, the cited text is irrelevant to what is being claimed. The claims make no mention of compensating for head skew. Moreover, the cited passage of text has nothing at all to do with characterizing an array lens or determining compensation parameters based upon such a characterization. The fact that Yoshida may teach a method of correcting for head skew does not cure Chase's lack of teaching the claimed subject matter.

Neither Chase nor Yoshida nor the combination of both disclose all the features of claim 1. Accordingly, it is submitted that claim 1 and claims 2-6 that depend therefrom distinguish patentably over the references.

Claim 8 calls for, among other elements, “a memory which stores a plurality of parameters to compensate for the array lens induced artifacts.” Neither Chase nor Yoshida nor their combination disclose such a memory which stores parameters to compensate for array lens induced artifacts. In fact, neither reference even mentions such artifacts let alone storing parameters that compensate for the same in a memory. The Office Action alleges that Chase teaches the claimed memory, citing column 5, lines 5-20. However, no memory of any kind is mentioned in the cited text. Rather, the cited text merely mentions a recording medium that is used to record the image. The recording medium cannot be fairly equated with the claimed memory, i.e., the recording medium does not store parameters that compensate for the array lens induced artifacts. Both Chase and Yoshida fail to disclose any parameters that compensate for array lens induced artifacts. Accordingly, claim 8 and claims 9-12 that depend therefrom distinguish patentably over the references.

Claim 13 calls for “determining an error attributable to at least one selected coordinate on an array lens; scanning a physical image using the array lens with the determined error, resulting in an image representation including artifacts; and compensating for the determined error in the scanned physical image, resulting in a post-compensated image representation.” Additionally, claim 16 calls for “determining an error attributable to at least one selected coordinate on an array lens; receiving a desired image representation; compensating for the determined error in the image representation resulting in a pre-compensated image representation; and outputting the pre-compensated image representation on a physical media.” Neither Chase nor Yoshida nor their combination teach determining an error attributable to at least one coordinate on an array lens, nor do they teach

compensating for that determined error. Again, Chase does not determine any error or compensate for it as such. Rather, Chase merely uses blended printing zones to randomly spread the contribution from an errant printing device so as to make any artifacts associated with the individual device less perceivable. As for Yoshida, a form of compensation is contemplated, i.e., to address print head skew. However, the compensation does not equate to the claimed compensation that addresses determined error attributable to at least one selected coordinate on an array lens. Therefore, claims 13 and 16 and claims 14, 15, 17 and 18 that depend therefrom distinguish patentably over the references.

### **CONCLUSION**


For the reasons detailed above, it is respectfully submitted all the claims remaining in the application (i.e., claims 1-18) are now in condition for allowance.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call the below signed at the telephone number listed.

Respectfully submitted,

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2/12/04  
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